



UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO: 00-6309-CR-SEITZ

UNITED STATES OF AMERICA,

Plaintiff,

-VS-

JULIUS BRUCE CHIUSANO,

Defendant.

MOTION FOR PERMISSION TO TRAVEL WHILE ON PROBATION

COMES NOW, the Defendant, JULIUS BRUCE CHIUSANO, by and through undersigned counsel and pursuant to the Federal Rules of Criminal Procedure, and respectfully requests that this Honorable Court enter an Order permitting the Defendant to leave the State of Florida, and travel to Atlantis, Nassau Bahamas, and for grounds, would show unto the Court the following;

1. That the Defendant, JULIUS BRUCE CHIUSANO, has been serving a three (3) year probationary term since August 2003 without incident.
2. That the Defendant since being placed on probation has traveled on three (3) occasions with the permission of his United States Probation Officer.
3. That the Defendant respectfully requests this Honorable Court grant him permission to travel to Atlantis, Nassau, Bahamas for the period of December 30, 2004, for the New Year holiday.
6. That the Defendant desires to travel outside of the State of Florida for approximately Three (3) days beginning on or about December 30, 2004 and returning January 2, 2005.
7. That the Defendant will be traveling with his employer on a charter flight and staying at the Atlantis Resort, Nassau, Bahamas.
8. The Defendant consistent with his special conditions of probation will not participate in any gambling activities during his stay in Nassau, Bahamas.
9. That undersigned counsel understands that the United States Probation Officer,

1524/12

Anthony Gagliardi, has expressed no objection to this travel request.

WHEREFORE, by reason of the foregoing, the Defendant, JULIUS BRUCE CHIUSANO, respectfully requests this Honorable Court enter an Order permitting the Defendant to travel outside the State of Florida to Nassau, Bahamas.

I HEREBY CERTIFY that a copy of the foregoing has been furnished to Anthony Gagliardi, United States Probation, 6100 Hollywood Boulevard, Suite 501, Hollywood, FL 33024, by U.S. Mail, and the original hereof filed with the Clerk of the Court, by Hand Delivery, this 20 DECEMBER, 2004.

Respectfully submitted,

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By: 

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